

purporting to be mine is a forgery. The purported signature of my mother on Exhibit 67 is also not hers. Both Exhibit 67, and Exhibit 160, are each forgeries.

7. Likewise, Exhibit 61 is a document dated June 29, 2004. I did not sign that document and my purported signature on Exhibit 61 is a forgery.

8. This lawsuit is unauthorized. The people purporting to represent the Plaintiff company do not represent that company, because I do. In fact, I am and remain the owner of 99.9% of the voting interests in Procapui. Proof of my ownership of Procapui is attached to this declaration as Exhibit 1. The claims that I am a fugitive from justice for some criminal offense in Brazil or France is totally false. See Exhibit 2 attached. I have never authorized Mr. Anavian, Mr. DeMaio or anyone else to commence or to prosecute any litigation against G.F. Higgins or against any member of the Higgins family or to seek to collect any money from them.

9. I wish also to comment briefly on the declaration of my uncle, Jozef Anavian dated September, 2007 although not, as stated above, to contravene every false assertion in that declaration of which there are many. In his declaration, Mr. Anavian says, among other things, that he had no idea of the financial condition of Procapui or the many problems relating to its business until he came to live full time Brazil in 2004. This is not true. I always kept Mr. Anavian fully apprised of what was happening in the business. Of course, after 2002, when he transferred his shares to me, he might not necessarily have been entitled to such information. As one of our original investors and still a guarantor of our agreement with Higgins and as a family member, I kept him aware of what was

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